

TIMOTHY COURTNEY, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER  
SOLUTIONS, INC. d/b/a FBCS, INC.,

Defendant.

Case No. 2:24-cv-02153-KSM

CLASS ACTION

ONIEQUE MORGAN, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

FINANCIAL BUSINESS AND CONSUMER  
SOLUTIONS, INC.,

Defendant.

Case No. 2:24-cv-02163-NIQA

CLASS ACTION

**DEFENDANT FINANCIAL BUSINESS AND CONSUMER SOLUTIONS, INC.’S  
RESPONSE TO COORDINATED PLAINTIFFS’ AMENDED MOTION TO  
CONSOLIDATE CASES AND APPOINT INTERIM CO-LEAD CLASS COUNSEL**

Defendant Financial Business and Consumer Solutions, Inc. (“FBCS”), has reviewed Coordinated Plaintiffs’ Amended Motion to Consolidate Cases and Appoint Interim Co-Lead Class Counsel (the “Amended Motion to Consolidate”) (DI. 8) and does not oppose the portion of the Amended Motion to Consolidate seeking consolidation of the fourteen (14) above-captioned actions, as well as any future related actions that may be filed in, or transferred or removed, to this Court, under the docket of the first-filed *Reichbart* Action (No. 2:24-cv-01876-NIQA). FBCS has filed, or will file, motions to stay responsive pleading deadlines pending resolution of the Amended

Motion to Consolidate in each of the above-captioned actions, virtually all of which FBCS has confirmed to be unopposed. FBCS respectfully requests that, following the resolution of the Amended Motion to Consolidate, the Court allow the parties to confer and report to the Court with a proposed schedule governing responsive pleading deadlines.

At this juncture, and in light of the early stage of the proceedings and the number of pending actions and counsel, FBCS takes no position on the portion of the Amended Motion to Consolidate seeking the appointment of Interim Co-Lead Counsel and Liaison Counsel (together, “Proposed Class Counsel”). FBCS reserves the right to revisit its stance on Proposed Class Counsel at a later date.

Dated: May 24, 2024

**BAKER & HOSTETLER LLP**

/s/ Nathalie A. Freeman

Edward J. McAndrew (Pa. I.D. 77103)

Nathalie A. Freeman (Pa. I.D. 333177)

1735 Market Street, Suite 3300

Philadelphia, PA 19103

Tel.: (215) 564-8386

Email: [emcandrew@bakerlaw.com](mailto:emcandrew@bakerlaw.com)

Email: [nfreeman@bakerlaw.com](mailto:nfreeman@bakerlaw.com)

Robyn M. Feldstein (*Pro hac vice application forthcoming*)

45 Rockefeller Plaza

New York, NY 10111

Tel.: (212) 589-4200

Email: [rfeldstein@bakerlaw.com](mailto:rfeldstein@bakerlaw.com)

*Attorneys for Defendant Financial Business  
and Consumer Solutions, Inc.*

**CERTIFICATE OF SERVICE**

I, Nathalie A. Freeman, hereby certify that on this 24<sup>rd</sup> day of May, 2024, I caused a true and correct copy of the foregoing Response to Coordinated Plaintiffs' Amended Motion to Consolidate Cases and Appoint Interim Co-Lead Class Counsel to be served via CM/ECF and email on the following counsel of record:

Andrew W. Ferich  
AHDOOT & WOLFSON, PC  
201 King of Prussia Road, Suite 650  
Radnor, PA 19087  
[aferich@ahdootwolfson.com](mailto:aferich@ahdootwolfson.com)

Melissa Clark  
AHDOOT & WOLFSON, PC  
2600 W. Olive Avenue, Suite 500  
Burbank, CA 91505  
[mclark@ahdootwolfson.com](mailto:mclark@ahdootwolfson.com)

Gary Klinger  
MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, PPLC  
227 W. Monroe Street, Suite 2100  
Chicago, IL 60606  
[gklinger@milberg.com](mailto:gklinger@milberg.com)

Mariya Weekes  
MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, PPLC  
201 Sevilla Avenue, 2<sup>nd</sup> Floor  
Coral Gables, FL 33134  
[mweekes@milberg.com](mailto:mweekes@milberg.com)

Jeff Ostrow  
Kristen Lake Cardoso  
KOPELOWITZ OSTRO PA  
1 Las Olas Blvd., Suite 500  
Ft. Lauderdale, FL 33301  
[ostrow@kolawyers.com](mailto:ostrow@kolawyers.com)  
[cardoso@kolawyers.com](mailto:cardoso@kolawyers.com)

Dated: May 24, 2024

/s/ Nathalie A. Freeman  
Nathalie A. Freeman

*Attorney for Defendant Financial Business  
and Consumer Solutions, Inc.*